

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

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| <b>PATRICIA KAMMEYER, et al.</b>   | <b>:</b> | <b>Case No. C-1-01-649</b>                         |
| <b>Plaintiffs</b>                  | <b>:</b> | <b>Spiegel, J.<br/>Black, MJ.</b>                  |
| <b>vs.</b>                         | <b>:</b> |  |
| <b>CITY OF SHARONVILLE, et al.</b> | <b>:</b> | <b>DECLARATION OF ATTORNEY<br/>PAUL M. LAUFMAN</b> |
| <b>Defendants</b>                  | <b>:</b> |  |
|                                    | <b>:</b> |  |

I, Paul M. Laufman, submit this declaration pursuant to 28 U.S.C. § 1746:

1. I am one of the attorneys for the plaintiffs in the above captioned action.
2. I was contacted by Ravert ("Jay") Clark in approximately mid-February.

Attorney Clark had previously represented the plaintiffs in this matter. Attorney Clark advised me that he had received a subpoena issued by counsel for defendant Cramer. I advised attorney Clark that plaintiffs had not been served with a copy of the subpoena and were not aware of it.

3. Attorney Clark had previously provided his case file to our office.

Attorney Clark indicated to me that he was now unable to locate his case file. Attorney Clark asked that I make a copy of the file which had been provided and return it to him. I advised attorney Clark that I wanted to review the subpoena and consider the matter further before returning his file to him. I advised that his file was likely privileged and that we would likely object to the subpoena. I asked attorney Clark to forward a copy of the subpoena. No copy of the subpoena was provided at that time.

4. My understanding was that attorney Clark had forwarded his entire file to our office and that he was in no longer is possession of any documents which would be subject to the subpoena. I suggested to attorney Clark that he was under no obligation to respond to the subpoena as he had no longer had any documents in his possession. Attorney Clark acknowledged that analysis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

s/ Paul M. Laufman  
Paul M. Laufman

July 1, 2004  
Date